

## MEMORANDUM

TO: Missouri Public Service Commission Official Case File, Case No. EO-2009-0254, KCP&L Greater Missouri Operations Company

FROM: Matthew Barnes, Utility Regulatory Auditor IV

DATE: /s/ John Rogers 7-30-2010                      /s/ Sarah Kliethermes 7-30-2010  
Energy Department / Date                      Staff Counsel's Office / Date

SUBJECT: Staff's Analysis of and Recommendation Concerning KCP&L Greater Missouri Operations Company's Third Fuel Adjustment Clause True-up Filing Under the Provisions in 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

DATE: July 30, 2010

On June 30, 2010, KCP&L Greater Missouri Operations Company (GMO) filed with the Commission in the form of direct testimony and supporting schedules by Tim M. Rush, its third true-up filing under the provisions in 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5). According to GMO's true-up filing, GMO under-collected \$768,873 from its customers in the former Aquila Networks-MPS territory (MPS) and under-collected \$377,151 from its customers in the former Aquila Networks-L&P territory (L&P) during the third recovery period (March 1, 2009 through February 28, 2010) that followed its third accumulation period (June 1, 2008 through November 30, 2008).

The Missouri Public Service Commission Staff (Staff) examined the direct testimony of Tim M. Rush, the analysis GMO provided with its application in this case, the monthly information GMO provided to Staff, and the GMO responses to data requests in the recent prudence audit case (Case No. EO-2010-0167). Staff also reviewed GMO's interest calculations for MPS and L&P and agrees with these interest calculations.

Based on its examination and analysis of information filed by GMO, the Staff recommends the Commission approve GMO's third true-up filing for the third recovery period (March 1, 2009 through February 28, 2010) during which GMO under-collected \$768,873 from its customers in MPS and under-collected \$377,151 from its customers in L&P. The under-collected amounts are included in GMO's current semi-annual Fuel Adjustment Clause filing in Case No. ER-2010-0385 made on June 30, 2010 for the sixth accumulation period (December 1, 2009 through May 31, 2010).

Staff has verified that GMO has filed its 2009 annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

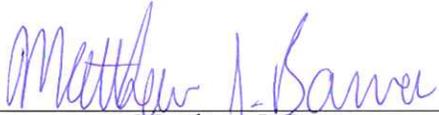
**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of KCP&L Greater )  
Missouri Operations Company for )  
Authority to Implement Rate )  
Adjustments Required by 4 CSR 240- )                   Case No. EO-2009-0254  
20.090(4) and the Company's Approved )  
Fuel and Purchased Power Cost )  
Recovery Mechanism )

**AFFIDAVIT OF MATTHEW J. BARNES**

**STATE OF MISSOURI**    )  
                                  ) ss  
**COUNTY OF COLE**     )

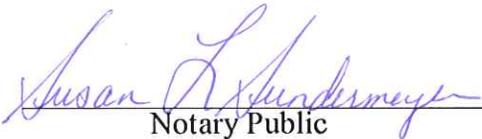
Matthew J. Barnes, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.

  
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Matthew J. Barnes

Subscribed and sworn to before me this 30<sup>th</sup> day of July, 2010.



SUSAN L. SUNDERMEYER  
My Commission Expires  
September 21, 2010  
Callaway County  
Commission #06942086

  
\_\_\_\_\_  
Notary Public